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July 8, 2020

VIA ECF

Hon. Edgardo Ramos
United States District Court
Southern District of New York
40 Centre Street
New York, NY 10007

MEMO ENDORSED

RE: Maldonado Isidro et al v. Bay Seafood Cuisine East 49th, LLC
19-cv-09101-ER

Hon. Edgardo Ramos:

Our office represents the collective Plaintiffs in the above-referenced matter. I am writing to request a three-week extension of the time to file the motion for default judgment, from today, July 8, 2020 until July 29, 2020. This is the second request for an extension, which was originally granted on or about June 16, 2020 to adjourn the motion deadline until today.

The reasons for the request are the same as in the June 16, 2020 letter to your Honor. As COVID has made communication and in-person meetings difficult with our clients, we have had some delays in getting all the declarations signed.

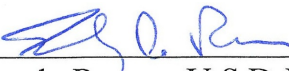
As of today, we have declarations for three of the five clients. The remaining two clients assure us that they will have the declarations returned to us in the next week. At that time, we will be able to file the default without further delay.

Defendants have not appeared since their attorneys withdrew and have not been contacted regarding this request.

I appreciate the Court's time and attention to this matter and await your response.

Plaintiffs' request for an extension of the time to file a motion for default judgment until July 29, 2020 is granted.

It is SO ORDERED.



Edgardo Ramos, U.S.D.J.
Dated: 7/8/2020
New York, New York

Best regards,

s/s Kevin S. Johnson, Esq.
Kevin S. Johnson, Esq.
Michael Faillace & Associates, P.C.